

EXHIBIT I

Subject: Re: EXTERNAL-Re: MDL 2804 -- Branded Exhibits

Date: Wednesday, October 2, 2019 at 9:01:44 PM Mountain Daylight Time

From: Alex Harris

To: Ackerman, David

CC: David Cohen, 2804 Discovery, MDL, xALLDEFENDANTS-MDL2804-Service, Kurt Govertsen, Baden, John, McNeil, Johnathan

David,

It is now late in the day and we have heard nothing except that your IT team is looking into these problems with Plaintiffs' branded exhibits. Please provide an update.

BartlitBeck LLP

Alex J. Harris | p: 303.592.3197 | c: 503.347.1652 | Alex.Harris@BartlitBeck.com | 1801 Wewatta Street, Suite 1200, Denver, CO 80202

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From: Kurt Govertsen <kurt.govertsen@bartlitbeck.com>

Date: Wednesday, October 2, 2019 at 1:13 PM

To: "Ackerman, David" <dackerman@motleyrice.com>, Alex Harris <alex.harris@bartlitbeck.com>

Cc: "McNeil, Johnathan" <jmcneil@motleyrice.com>, "Baden, John" <jbaden@motleyrice.com>

Subject: RE: EXTERNAL-Re: MDL 2804 -- Branded Exhibits

David and Johnathan, good afternoon.

The principal issues we've identified to date are:

1. Leaving aside the CU and SU prefixed exhibits and only looking at the P exhibits, a comparison of the exhibit list provided yesterday afternoon (PLTF Exhibit List OCT 1.xlsx) to the filenames of the PDFs that were uploaded to Ricoh yesterday in the P-000001.zip multi-part ZIP container (after dropping the _00001 suffixes) indicates that 15,255 P exhibits on your list were not provided as PDFs. Please see the attached list.
2. None of P-prefix PDFs provided to date have a text layer with the limited exception that the text contained within the yellow trial exhibit stickers is searchable. Certain exhibits also do not contain a yellow exhibit sticker on the first page and those that we've reviewed have no text layer at all.

BartlitBeck LLP

Kurt Govertsen | Associate Director, Litigation Support | p: 312.494.4121 | m: 312.206.5702 |
Kurt.Govertsen@BartlitBeck.com | Courthouse Place, 54 West Hubbard Street, Chicago, IL 60654

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From: Ackerman, David <dackerman@motleyrice.com>

Sent: Wednesday, October 2, 2019 2:04 PM

To: Alex Harris <alex.harris@bartlitbeck.com>

Cc: Kurt Govertsen <kurt.govertsen@bartlitbeck.com>; McNeil, Johnathan <jmcneil@motleyrice.com>;
Baden, John <jbaden@motleyrice.com>

Subject: RE: EXTERNAL-Re: MDL 2804 -- Branded Exhibits

Thanks Alex. I've copied Johnathan McNeil.

David I. Ackerman | Attorney at Law | Motley Rice LLC
401 9th St. NW, Suite 1001 | Washington, DC 20004 | dackerman@motleyrice.com
o. 202.849.4962 x5962 | c. 202.997.1217 | f. 202.386.9622

From: Alex Harris <alex.harris@bartlitbeck.com>
Sent: Wednesday, October 2, 2019 3:03 PM
To: Ackerman, David <dackerman@motleyrice.com>
Cc: Kurt Govertsen <kurt.govertsen@bartlitbeck.com>
Subject: Re: EXTERNAL-Re: MDL 2804 -- Branded Exhibits

David,

I have copied Kurt Govertsen, who can speak to your IT folks about the issues we are seeing with plaintiffs' branded exhibits. Thanks.

BartlitBeck LLP

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From: Alex Harris <alex.harris@bartlitbeck.com>
Date: Wednesday, October 2, 2019 at 1:00 PM
To: "Ackerman, David" <dackerman@motleyrice.com>
Cc: David Cohen <David@SpecialMaster.Law>, "2804 Discovery, MDL" <mdl2804discovery@motleyrice.com>, xALLDEFENDANTS-MDL2804-Service <xALLDEFENDANTS-MDL2804-Service@arnoldporter.com>
Subject: Re: EXTERNAL-Re: MDL 2804 -- Branded Exhibits

Understood. I will separately send you contact information for our IT person. Thanks.

BartlitBeck LLP

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From: "Ackerman, David" <dackerman@motleyrice.com>
Date: Wednesday, October 2, 2019 at 12:56 PM
To: Alex Harris <alex.harris@bartlitbeck.com>
Cc: David Cohen <David@SpecialMaster.Law>, "2804 Discovery, MDL" <mdl2804discovery@motleyrice.com>, xALLDEFENDANTS-MDL2804-Service <xALLDEFENDANTS-MDL2804-Service@arnoldporter.com>
Subject: RE: EXTERNAL-Re: MDL 2804 -- Branded Exhibits

Alex,

Thank you for reaching out. We have our IT personnel and vendor looking into the download because we believe that we produced searchable PDF files. We are also looking into the missing exhibit issue and will likely be posting an additional download later this afternoon. We will comply with Special Master Cohen's deadline concerning reduction of exhibits and witnesses, but have not yet determined the precise exhibits that will be removed.

Might I suggest that you provide contact information for an IT person who can then connect with our IT person? This may be an issue that is best connected via direct communication between the IT professionals.

David

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From: Alex Harris <alex.harris@bartlitbeck.com>
Sent: Wednesday, October 2, 2019 10:55 AM
To: Ackerman, David <dackerman@motleyrice.com>
Cc: David Cohen <David@SpecialMaster.Law>; 2804 Discovery, MDL <mdl2804discovery@motleyrice.com>;
xALLDEFENDANTS-MDL2804-Service@arnoldporter.com
Subject: EXTERNAL-Re: MDL 2804 -- Branded Exhibits

David,

We have finished downloading plaintiffs' branded exhibits and they do not appear to contain any searchable text. Sections D and E of the parties' Trial Exhibit Stipulation (attached) require production of searchable PDFs. Please provide defendants with OCR'd versions of the stickered exhibits as soon as possible.

Comparing the branded exhibits to plaintiffs' most recent list, we also appear to be missing branded PDFs for roughly 15,000 of plaintiffs' exhibits, all of which begin with the "P-" prefix. We assume these are all exhibits plaintiffs plan to cut from their list. Please correct us if that is wrong.

BartlitBeck LLP

Alex J. Harris | p: 303.592.3197 | c: 503.347.1652 | Alex.Harris@BartlitBeck.com | 1801 Wewatta Street, Suite 1200, Denver, CO 80202
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From: "Ackerman, David" <dackerman@motleyrice.com>
Date: Tuesday, October 1, 2019 at 1:01 PM
To: xALLDEFENDANTS-MDL2804-Service <xALLDEFENDANTS-MDL2804-Service@arnoldporter.com>
Cc: "2804 Discovery, MDL" <mdl2804discovery@motleyrice.com>
Subject: MDL 2804 -- Branded Exhibits

External E-mail

Plaintiffs' branded exhibits have been uploaded to the Ricoh site. The password to access the exhibits is:
6#tc?V

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